

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

HAROLD F. BOOSAHDA,)	
)	
Plaintiff)	
)	
v.)	Civil Action No. 1:09-cv-00556-IDD
)	
PROVIDENCE DANE, LLC)	
)	
Defendant.)	
)	

STIPULATION OF UNDISPUTED FACTS

Pursuant to the Court's order in this action on April 15, 2010, the parties stipulate to the following facts as undisputed for purposes of this action:

1. Among debts that Defendant regularly collects or attempts to collect are debts owed or due or asserted to be owed or due another by consumers to pay money arising out of transactions in which the money, property, insurance, or services which are the subject of the transactions are primarily for personal, family, or household purposes.

2. Defendant regularly uses the mails and other instrumentalities of interstate commerce in its collection of or attempts to collect debts owed or due or asserted to be owed or due another by consumers.

3. In March, 2008, Defendant sent two demand letters to Plaintiff.

4. The document designated as Defendant's Exhibit A represents the text of the two demand letters sent to Plaintiff.

5. On or about May 16, 2008, Defendant sent to the Clerk of the Circuit Court for Fairfax County a civil complaint (titled a motion for judgment) against Boosahda with instructions to the clerk to file that complaint.

6. The complaint that Defendant filed against Boosahda in the Circuit Court for Fairfax County was assigned Case No. CL2008-6644.

7. The document that has been designated as Plaintiff's Exhibit 1 is a copy of the complaint in Case No. CL2008-6644 together with discovery that Defendant served on Plaintiff

8. Defendant had the complaint in Case No. CL2008-6644 together with discovery in that action served on Plaintiff on August 5, 2008 as shown in the document designated as Defendant's Exhibit L.

9. Defendant on August 18, 2008, mailed to Boosahda and then on August 20, 2008, filed with the court in Case No. CL-2008-6644 a motion for default judgment against Boosahda..

10. The document designated as Plaintiff's Exhibit 2 is a copy of the motion for default judgment filed against Boosahda.

11. On or about October 16, 2008, Boosahda's counsel responded to the requests for admissions that Defendant had served on Boosahda in Case No. CL-2008-6644.

12. On or about January 5, 2009, Boosahda's counsel filed a counterclaim and also responded to discovery that Defendant had served on Boosahda in Case No. CL-2008-6644.

13. The document designated as Plaintiff's Exhibit 3 is a copy of the scheduling order entered in Case No. CL-2008-6644.

14. On or about February 18, 2009, Defendant served answers and responses to interrogatories and document requests that Boosahda had propounded on Defendant in January, 2009 in Case No. CL-2008-6644.

15. Defendant filed its witness and exhibit list for the March 30, 2009 trial in Case No. CL-2008-6644 on March 20, 2009.

16. The document designated as Plaintiff's Exhibit 5 is a copy of the witness and exhibit list that Defendant filed on March 20, 2009 in Case No. CL-2008-6644 .

17. On or about March 23, 2009, Defendant filed with the court in Case No. CL-2008-6644 a document entitled Plaintiff's Brief on Matter of Authentication.

18. The document designated as Defendant's Exhibit E is a copy of Defendant's Brief on the Matter of Authentication in Case No. CL-2008-6644.

19. The documents designated as Defendant's Exhibit J and Plaintiff's Exhibit 6 combined are a copy of the trial transcript in Case No. CL-2008-6644.

20. The document designated as Defendant's Exhibit N is the April 9, 2010 deposition of Mike Cardoza, CEO, Providence Dane, LLC.

21. The document designated as Defendant's Exhibit M is the April 6, 2010 deposition of Mr. Harold F. Boosahda..

22. The document designated as Defendant's Exhibit P is the April 8, 2010 response by Plaintiff to Defendant's March 6, 2010 Requests for Admission.

Respectfully submitted,

/s/Ernest P. Francis

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